

# EXHIBIT 16

**From:** Michael Bloch  
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**Subject:** Sines v. Kessler, Case No. 17 Civ 72  
**Date:** Wednesday, June 19, 2019 8:55:12 PM  
**Attachments:** [Exhibit 1.pdf](#)

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Dear Judge Hoppe:

We are writing to alert Your Honor to messages recently posted on social media by Defendant Christopher Cantwell, threatening Plaintiffs' counsel, Roberta Kaplan.

Yesterday, Mr. Cantwell posted the following in reference to Ms. Kaplan: "After this stupid kike whore loses this fraudulent lawsuit, we're going to have a lot of fucking fun with her." A screenshot of his post is attached.

At a minimum, this sort of conduct obviously undermines the integrity of the judicial process, and we intend to submit a more formal request for appropriate relief shortly. In the meantime, because this implicates the security concerns that we have previously raised and that we expect will be a continuing issue throughout this litigation, we wanted to bring this to Your Honor's immediate attention. We will be prepared at the next conference to discuss additional security measures that we believe will be necessary as this case proceeds toward trial.

Respectfully submitted,

**Michael Bloch | Kaplan Hecker & Fink LLP**

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